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8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 **SAN JOSE DIVISION**

11 In re Case No. 21-50028-SLJ

12 EVANDER FRANK KANE, Chapter 7

13 Debtor. Adv. Proc. No. 21-5008

14 **JOINT DISCOVERY PLAN**

15 HOPE PARKER Status Conference: October 28, 2021
16 Plaintiff Time: 1:30 p.m.
17 v. Ctrm: Tele/videoconference

18 EVANDER FRANK KANE

19 Defendant

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23 Plaintiff, Hope Parker (“Parker”), and Defendant, Evander Kane (“Kane”), hereby file
24 their joint discovery plan pursuant to the Court’s Order re Initial Disclosures and Discovery
25 Conference (ECF #2). Parker and Kane are referred to herein as the “Parties”:

26 1. The Parties held a discovery conference on October 7, 2021, during which they
27 discussed anticipated discovery in this case and the potential for resolution of
28 matters.

JOINT DISCOVERY PLAN

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2. Because the Parties conducted discovery in the state court proceeding prior to Kane's filing of his bankruptcy, the Parties agree to allow two months for Kane to obtain the discovery from his state court counsel.
3. The Parties agree to exchange initial disclosures by December 19, 2021.
4. The Parties agree that any additional discovery may commence beginning December 19, 2021.
5. Fact discovery cutoff:
 - a. The Parties agree to a fact discovery cutoff of April 29, 2022.
6. Expert discovery cutoff:
 - a. The Parties agree to that to the extent they determine that any experts are required in this case, there will be an expert discovery cutoff date of June 17, 2022.

Currently, the Parties do not request entry of any orders under Fed. R. Bankr. P. 7016(b) and (c) or 7026(a)(1).

Dated: October 15, 2021

FINESTONE HAYES LLP

/s/ Stephen D. Finestone
Stephen D. Finestone
Attorneys for Evander Kane

Dated: October 15, 2021

J. LEWIS & ASSOCIATES, APLC

/s/ Jonathan J. Lewis
Jonathan J. Lewis
Attorneys for Hope Parker